

**COMPARATIVE ANALYSIS**

**RULE 69.5.1 – NATURAL GAS-FIRED WATER HEATERS**

Statutory Requirements

Prior to adopting, amending, or repealing a rule or regulation, California Health and Safety Code Section 40727 requires findings of necessity, authority, clarity, consistency, non-duplication, and reference. As part of the consistency finding to ensure proposed rule requirements do not conflict with or contradict other San Diego County Air Pollution Control District (District) or federal regulations, Health and Safety Code Section 40727.2(a) requires the District to perform a written analysis identifying and comparing the air pollution control standards and other provisions of proposed new Rule 69.5.1 with existing or proposed District rules and guidelines and existing federal rules, requirements, and guidelines applying to the same source category.

Analysis

Proposed new Rule 69.5.1 applies to manufacturers, sellers, distributors, or installers of natural gas-fired water heaters with a heat input rating of less than 75,000 Btu per hour. The proposed new rule will replace current District Rule 69.5, which applies to the same source category. There are no other existing or proposed District rules or guidelines that apply to the natural gas-fired water heaters mentioned above.

There are no applicable existing or proposed federal regulations for combustion equipment subject to proposed new Rule 69.5.1. The District does not intend to submit proposed new Rule 69.5.1 to be included in the federal State Implementation Plan. Thus, proposed new Rule 69.5.1 will not be a federally-applicable or enforceable requirement.